

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

**UNITED STATES OF AMERICA**

**V.**

**VICTOR GUILLERMO LIRA-AVALOS**

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**CASE NO. 1:22-CR-00267**

**MOTION TO LIST WITNESSES**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, VICTOR GUILLERMO LIRA-AVALOS, Defendant in the above-entitled and numbered cause by and through his attorney of record and files this his Motion to List Witnesses and for cause would respectfully show as follows:

**I.**

The names of the witnesses that the United States Attorney will call in its case in chief are in the exclusive possession of said prosecuting attorney. The Defendant is entitled to the disclosure of such witnesses by the Government prior to the voir dire examination of the jury panel, because without which he will be unable to select a fair jury and provide effective assistance to his counsel, guaranteed to him under the laws and Constitution of the United States.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that this motion be in all things granted.

Respectfully submitted,  
LAW OFFICE OF EDDIE LUCIO

/s/ Eddie Lucio  
Eddie Lucio  
LAW OFFICE OF EDDIE LUCIO  
Federal ID No. 22009

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**Attorney for Defendant**

**CERTIFICATE OF CONFERENCE**

I, the undersigned, hereby certify that on April 22, 2022 I have conferred with the Assistant U.S. Attorney, David A. Lindenmuth, about this Motion to List Witnesses.

/s/ Eddie Lucio  
Eddie Lucio

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 25<sup>th</sup> day of April, 2022, a true and correct copy of the foregoing Motion to List Witnesses, was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all parties.

/s/ Eddie Lucio  
Eddie Lucio